

not create insurmountable technical problems or significant network inefficiencies. (Pacific Companies Comments at 3-4) Finally, Ameritech, which "is implementing local loop unbundling in Illinois and Michigan," agrees with MFS that interconnection of unbundled loops can be accomplished using existing collocation arrangements. (Ameritech Comments at 2, 9)

Although there are no technical impediments to loop unbundling, the specific technical issues raised by GTE, SWBTC and NYNEX are common to all LECs and reinforce the need for uniform technical, interconnection and provisioning standards. None of the issues raised is incapable of solution, but should be addressed by the Commission to facilitate efficient interconnection.

First, GTE and SWBTC complain that if the local loop is unbundled from the LEC's switch, the LEC will not be able to perform testing and maintenance through its switch. Such testing and maintenance functions can be performed, however, through the central office switch of the competitive local exchange carrier that purchases the unbundled loop. Any adjustments or modifications necessary can be implemented in the competitive carrier's switch.

Second, SWBTC asserts that the incumbent LEC would have no way to determine the jurisdiction of the traffic passing over an unbundled loop. Under MFS' proposal for the assessment of Carrier Common Line charges on minutes of use originating or terminating on unbundled loops, the LEC would not need to know the jurisdiction of the traffic.^{34/}

^{34/} In its request for waiver of Part 69 of the Commission's Rules, NYNEX has proposed not to assess the Carrier Common Line charge on unbundled loops because of the impossibility of measuring traffic that does not pass through its switch. *In the matter of NYNEX Telephone Companies Petition for Waivers of Part 69 of the Commission's Rules to Provide Unbundled Common Lines*, DA 94-1136.

Finally, NYNEX, GTE and SWBTC contend that provisioning unbundled loops over digital pair gain or fiber facilities is more complex than provisioning such loops over voice-grade analog facilities.^{35/} MFS acknowledged as much in its Petition, but noted that technical solutions to these difficulties do exist. All parties will have an opportunity to address the provisioning issues, as well as the recovery of any associated costs, in the context of the rulemaking proceeding.

CONCLUSION

For the foregoing reasons, the Commission should reject the arguments of the State Regulatory Commissions and the LECs urging denial of MFS' Petition For Rulemaking. The Commission should grant the Petition and institute the rulemaking without delay.

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^{35/} NYNEX Comments at 17-18; GTE Comments, Attachment 1 at 2-4; SWBTC Comments at 43-45.

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April 1995, copies of MFS Communications Company, Inc.'s Reply Comments were served by first-class mail, postage prepaid, on the following:

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